

EXHIBIT 3

30(b)(6) Evan Maxim

2/5/2021

1 UNITED STATES DISTRICT COURT
2 WESTERN DISTRICT OF WASHINGTON
3 SEATTLE DIVISION

4 FIRS HOME OWNERS ASSOCIATION,)

5 Plaintiff,)

6 v.) No. 19-1130-RSL

7 CITY OF SEATAC,)

8 Defendant.)

9
10 Videoconference 30(b)(6) Deposition Upon Oral Examination

11 of

12 City of SeaTac

13 by

14 EVAN MAXIM

15
16 Taken Remotely Via Zoom Videoconference

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22 DATE: Friday, February 5, 2021

23 REPORTED BY: Ronald L. Cook
24 CCR, CRR, RDR, FAPR #2523
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1 **My first question for you, sir, is: Is**
2 **it the City's position as you sit here today that**
3 **approval of the relocation plan is not discretionary?**

4 A. Yes.

5 **Q. Who at the City determines whether a plan**
6 **is in compliance with the provisions of the SeaTac**
7 **Municipal Code?**

8 A. Staff within the Community and Economic
9 Development Department.

10 **Q. Does anyone else have any feedback into**
11 **whether the plan is in compliance?**

12 A. Other City staff in the Public Works
13 Department may have feedback, depending on the
14 circumstances of the application.

15 **Q. And to what extent would the opinions of**
16 **affected mobile home park residents influence the**
17 **City's determination whether a proposed relocation**
18 **plan is in compliance with the Code?**

19 A. It depends on the contents of the
20 opinions provided by the mobile home park occupants.
21 If those opinions were related to the criteria under
22 which the code was reviewed, City staff would confirm
23 whether or not the relocation plan complied with
24 applicable criteria. If those opinions were unrelated
25 to the applicable law, they would not influence the

C E R T I F I C A T E

STATE OF WASHINGTON)
) ss.
COUNTY OF KING)

I, the undersigned Washington Certified Court Reporter, pursuant to RCW 5.28.010, authorized to administer oaths and affirmations in and for the State of Washington, do hereby certify:

That the foregoing deposition of the witness named herein was taken stenographically before me and reduced to a typed format under my direction;

That, according to CR 30(e), the witness was given the opportunity to examine, read and sign the deposition after same was transcribed, unless indicated in the record that the review was waived;

That all objections made at the time of said examination have been noted by me;

That I am not a relative or employee of any attorney or counsel or participant and that I am not financially or otherwise interested in the action or the outcome herein;

That the witness coming before me was duly sworn or did affirm to tell the truth;

That the deposition as transcribed is a full, true and correct transcript of the testimony, including questions and answers and all objections, motions and exceptions of counsel made at the time of the foregoing examination;

That as a matter of firm policy, the stenographic notes of this transcript will be destroyed three years from the date appearing on this transcript, unless notice is received otherwise from any party or counsel hereto on or before said date.



RONALD L. COOK, CCR, RDR, FAPR
State of Washington CCR #2523